



City of Seattle

Gregory J. Nickels, Mayor

Department of Design, Construction and Land Use

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**CITY OF SEATTLE
ANALYSIS AND DECISION OF THE DIRECTOR OF
THE DEPARTMENT OF DESIGN, CONSTRUCTION AND LAND USE**

Application Number: 2204785

Applicant Name: Seattle School District Number One

Address of Proposal: 5149 S. Graham St., Graham Hill Elementary School

SUMMARY OF PROPOSED ACTION

Master Use Permit for future construction of a two-story, 17,780 sq. ft. addition to an existing public school (Graham Hill Elementary). The project includes on-site parking for 59 vehicles. The project also includes future demolition of existing structures on the site. An Environmental Impact Statement and Addendum thereto were prepared by the Seattle School District.

The following approval is required:

SEPA - To approve or condition pursuant to Seattle's SEPA policies. Chapter 25.05, Seattle Municipal Code. (DNS prepared by Seattle Public Schools)

The following Development Standard Departure is requested:

1. To allow bus loading within the street right-of-way. - SMC 23.44.017G

SEPA DETERMINATION: ☐ Exempt ☐ DNS ☐ MDNS ☒ EIS*

☐ DNS with conditions

☐ DNS involving non-exempt grading, or demolition, or another agency with jurisdiction.

* Environmental Documents and SEPA Threshold Decision done by Seattle School District Number One.

BACKGROUND DATA

Site and Vicinity Description

The proposal site is the site of the current Graham Hill Elementary School between S. Graham St. and 51st Av. S., about mid-way between Rainier Av. S. and Wilson Av. S., in the Rainier Valley area of Seattle. In the middle of an area of single family, SF 7200 zoning, the existing school has been in operation since the 1960's. The site has multiple levels. Single family homes are present across each of the two streets upon which the site faces and along the east property line.

Proposal Description

The Seattle School District proposes to demolish the existing on-site portables and construct a new 17,780 sq. ft. library, classroom and daycare addition to the west end of the existing 1960's structure. No expansion of the school site is proposed; the goal of the project is to replace the existing temporary facilities with a permanent structure. In its current configuration there are two limited on-site parking lots and no on-site bus loading.

The proposed new site configuration would have on-site parking for 59 vehicles, most in a lot along the western portion of the site where the portables currently reside. There will also be a new, two-story classroom addition with a daylight basement that will serve as an on-site daycare facility. Bus loading areas would continue to be on adjacent public streets.

Included in the campus designed to meet Seattle School District educational standards is the ability to open the library, computer room, gymnasium and cafeteria and stage for community use at times when school is not in session.

Public Comments

Three, noticed, public meetings of the Development Standard Departure Advisory Committee ("Committee") were held (September 25, 2002, January 29, 2003 and February 11, 2003) at which public comment was received. Attendance at these meetings averaged about 15 people in addition to the Committee and project professionals. Discussion centered around the location of the proposed on-street bus loading with many residents living on 51st Av. S. expressing concern about noise, pollution, traffic safety, reduced parking, ADA access to the school and neighborhood safety. Other than those comments centered on the departure process, a single comment letter was received indicating some doubt as to whether the project is necessary, from the District's point of view. The official SEPA comment period ran from October 24, 2002 to November 7, 2002.

ANALYSIS - Development Standard Departure

This Development Standard Departure process is being conducted pursuant to the provisions of Seattle Municipal Code sections 23.79.002-.012. Pursuant to these provisions an Advisory Committee was convened, public comment received, and a written recommendation to the

Director of DCLU made. This analysis and decision is made pursuant to the requirements of SMC section 23.79.010 that the Director determine the amount of departure to be allowed as well as mitigation measures to be imposed. Criteria set forth in the applicable code sections are to be used for both the Committee's recommendation and the Director's decision.

Relationship to Surrounding Area

To Allow Bus Loading within the Street Right-of-Way

The applicant seeks relief from the provision of SMC 23.44.017.G requiring all bus loading to be on the site and instead seeks approval to load buses in the street right-of-way. The existing school uses the S. Graham St. right-of-way for bus loading and this method was initially proposed for the new school. During the course of three departure meeting the Committee and the District moved to a proposal to unload on S. Graham St., load each afternoon on 51st Av. S. and use S. Graham St. during school days for both pick up and drop off of part day and special programs.

The small size of the school site necessitates this departure. Placing bus loading on the school site would take away space for the other necessary functions on the site. The Committee and DCLU accept this fact. The Committee heard extensive comment and carefully deliberated issues concerning which of the two adjacent streets should be used for bus loading. Testimony from both faculty and parents indicated that afternoon bus loading on S. Graham St. causes extreme traffic congestion and pedestrian safety issues as parents attempt to share the street as they pick students up from school. Testimony of District personnel and an SDOT representative indicated that afternoon bus pick up on 51st Av. S. would work well from a traffic perspective. In response to public comment, provisions for a lockable gate and ADA ramping were added to the District proposal for a walkway and steps from the school building to the bus loading area on 51st Av. S.

The Committee recommended, with a vote of five in favor and one opposed, that a departure to allow off-site bus loading be approved with the following conditioning language.

- Afternoon bus loading will take place on the east side of 51st Av. S. from 30' south of the S. Graham St. and 51st Av. S. intersection to the southern end of the School District property along 51st Av. S.. The loading zone hours will be from 2 PM to 4 PM Monday to Friday.
- Morning bus unloading, as well as load and unload operations for half day programs or as needed, shall take place on the south side of S. Graham St. from the existing eastern driveway to the new proposed western driveway in front of the school.
- The south side of S. Graham St. is to be signed for a load and unload only zone from the existing eastern drive to the proposed new western drive between the hours of 8am – 5pm Monday to Friday at the front of Graham Hill Elementary School.
- Seattle Public Schools will work with Seattle Department of Transportation to review parking restrictions on the north side of S. Graham St. along the frontage of Graham Hill Elementary School to relieve traffic congestion and increase safety.
- A handicap access ramp will be provided on the west side of Seattle Public School property to allow ADA access to the 51st Av. S. bus loading area.

- Graham Hill Elementary will provide yearly to all new families a parent/student school safety manual.
- Additional landscaping shall be provided on the Graham Hill Elementary school frontage along 51st Av. S. with input and review of adjacent neighbors.
- Seattle Public Schools will work with Seattle Department of Transportation to review parking requirements at the intersection of S. Graham St. and 51st Av. S. in order to facilitate turning movements of school buses onto Graham St.
- All right of way changes and or improvements suggested by Seattle Public Schools will be subject to Seattle Department of Transportation review and approval.

Based upon the above considerations and on a favorable School Development Standard Departure Advisory Committee recommendation, the requested development standard departure to allow on-street bus loading is granted.

DECISION - DESIGN DEPARTURE

1. *To allow bus loading within the street right-of-way.* **Conditionally Granted.**

ANALYSIS - SEPA

Environmental impacts of the proposal have been analyzed in environmental documents prepared by Seattle School District Number One. These include a May 13, 2002 checklist Addendum with specific information on the Graham Hill School project, Building Excellence Phase II Capital Improvement Program, Draft, Final and Addendum Supplemental and Programmatic Environmental Impact Statements dated July 11, 2000, September 1, 2000 and November 7, 2000, respectively and March 26, 2003 Heffron Transportation analysis of Bus Access and Safety Conditions.

Seattle Municipal Code (SMC) section 25.05.660 provides that proposals can be conditioned or denied in order to mitigate environmental impacts. All conditions must be related to impacts identified in the environmental documents, based on adopted policies, be reasonable and capable of being accomplished. This proposal is reviewed under that substantive SEPA authority.

Disclosure of the potential impacts from this project was made in the environmental documents listed above. This information, supplemental information provided by the applicant (plans, written descriptions of the project, environmental documents, traffic report), and the experience of this agency with review of similar projects form the basis for this analysis and conditioning.

The SEPA Overview Policy (SMC 25.05.665) establishes the relationship between codes, policies, and environmental review. Specific policies for specific elements of the environment, certain neighborhood plans, and other policies explicitly referenced may serve as the basis for exercising substantive SEPA authority.

The Overview Policy states in part:

"where City regulations have been adopted to address an environmental impact, it shall be presumed that such regulations are adequate to achieve sufficient mitigation (subject to some limitations)."

Under certain limitations/circumstances (SMC 25.05.665 D 1-7) mitigation can be considered. Thus, a more detailed discussion of some of the impacts is appropriate.

Short-Term Impacts

The following temporary or construction-related impacts are expected: decreased air quality due to suspended particulates from demolition and building activities and hydrocarbon emissions from construction vehicles and equipment; increased dust caused by construction activities; potential soil erosion and potential disturbance to subsurface soils during grading, excavation, and general site work; increased traffic and demand for parking from construction equipment and personnel; conflict with normal pedestrian movement adjacent to the site; increased noise; and consumption of renewable and non-renewable resources. Due to the temporary nature and limited scope of these impacts, they are not considered significant (SMC 25.05.794). Although not significant, these impacts are adverse and, in some cases, mitigation is warranted.

Several adopted City codes and/or ordinances provide mitigation for some of the identified impacts. Specifically these are: Stormwater, Grading, and Drainage Control Code (grading, site excavation, and soil erosion); Street Use Ordinance (watering streets to suppress dust, removal of debris, and obstruction of the pedestrian right-of-way); the Building Code (construction measures in general); and the Noise Ordinance (construction noise). Compliance with these applicable codes and ordinances will reduce or eliminate short-term impacts to the environment and, with the exception of noise impacts, they will be sufficient without conditioning pursuant to SEPA policies. Further discussion of short term noise, air quality, traffic and parking related impacts follows.

Noise

There will be some grading required to prepare the building site as well as other noise generating construction activities. Noise associated with construction of the building could adversely affect the residential areas in the vicinity of the proposal site. Due to the proximity of residentially zoned areas in relation to the proposal site, the limitations of the Noise Ordinance appear to be inadequate to protect the residential neighborhood. To minimize construction noise impacts to residential neighborhoods, DCLU has conditioned projects of a similar scale to limit hours of construction to 7:00 a.m. to 6:00 p.m. on non-holiday weekdays and to 9:00 a.m. to 5:00 p.m. on Saturdays. This condition has been successfully applied in the past and will be imposed here.

The Department recognizes there may be occasions when critical construction activities of an emergency nature, related to safety or traffic issues, or which could substantially shorten the total construction time frame, may need to be completed after regular construction hours as conditioned herein. Therefore, the Department reserves the right to approve waivers of this construction hours restriction. Such waivers must be approved by the Department on a case-by-case basis prior to such work.

It is also recognized that there are quiet non-construction activities that can be done at any time such as, but not limited to, site security, surveillance, monitoring for weather protection, checking tarps, surveying, landscaping, painting, and walking on and around the site and structure. These types of activities are not considered construction and will not be limited by the conditions imposed on this Master Use Permit.

In addition, after the building is fully enclosed, on a floor-by-floor basis, interior work may be done at any time in compliance with the Noise Ordinance with no pre-approval from the Department.

Construction Traffic

The applicant estimates that a total of 5,000 cu. yards of material will be either removed from or imported to the site. Deliveries of other construction materials are also to be expected during the course of construction. Movement of this amount of material is expected to require as many as 500 truck trips. The remainder of the construction materials used will be delivered by hundreds more trucks.

As a result of these trips, a negative impact, unmitigated by existing codes and regulations, will be introduced to surrounding streets and intersections. In order to limit this negative impact as much as possible it is necessary to require a DCLU-approved Truck Trip Plan which regulates the routes trucks carrying project-related materials will take so as to limit area impacts as much as possible and the times during which they may travel sufficiently to avoid causing any unacceptable deterioration of intersection levels of service. A further condition must require that this Truck Trip Plan be followed at all times. As so conditioned, the adverse impacts of construction traffic are adequately mitigated.

Parking

Construction workers can be expected to arrive at the site in private vehicles. Construction related vehicles, too, will be driven to the site and left for periods of time. Construction of the proposed school addition would take place while the remainder of the school is in operation. The school site as a whole, except for areas cordoned off for construction activities, would not be available for construction related parking. The peak periods of parking demand created by school operation and that created by construction activities will overlap. There is limited opportunity to mitigate this impact on the proposal site. Nevertheless it is important that construction-related parking impacts be contained on the site to the greatest extent possible.

In order to mitigate the negative impacts of construction workers vehicles and of other construction related vehicles on parking in the immediate area of the construction site it is necessary to condition this project to require that an on-site parking area or areas be created and maintained with capacity to accommodate construction worker's vehicles and other construction-related vehicles to the maximum extent construction activities (grading, paving, landscaping, etc.) on-site will allow. These parking areas shall be maintained in a manner which prevents the tracking of mud or dust onto surrounding streets.

Air Quality

Demolition, grading and construction activities each may create adverse air quality impacts in the surrounding area. The Puget Sound Clean Air Agency (“PSCAA”) regulations require control of fugitive dust to protect air quality. A PSCAA permit is required for the removal of hazardous materials such as asbestos. The Seattle Stormwater, Grading and Pollution Control Ordinance regulates on-site grading activities and requires that soil erosion control techniques be initiated for the duration of the work.

Existing regulation is sufficient to control short-term air quality impacts. In order to be certain that PSCAA reviews the proposed demolition it is necessary to file a Notice of Intent to Demolish with that agency. A condition of this MUP will be to file a PSCAA notice prior to demolition.

Long-Term Impacts

Long-term or use-related impacts are also anticipated from the proposal and include: increased traffic and increased parking demand; possible increase in light and glare; increased bulk and scale of the building; increased ambient noise due to increased human activity; increased demand on public services and utilities; increased energy consumption; and decreased air quality. These long-term impacts are not considered significant because the impacts are minor in scope.

Traffic and Parking

Because the proposal here is to demolish existing portable structures on the site and replace their functions in the remodeled and expanded Graham Hill Elementary School, without an expected increase in student population, while an additional 22 parking stalls are to be added, parking impacts on neighboring streets would be expected to lessen. Afternoon traffic congestion on S. Graham St. is expected to improve as a result of relocation of afternoon bus loading to 51st Av. S. The Heffron Transportation study included in the project file concludes that both pedestrian and traffic safety will be improved by the proposed relocation of afternoon bus loading and that buses are expected to be able to travel safely through the intersection of 51st Av. S. and S. Graham St.

Historic Resources

The District nominated Graham Hill Elementary School to be a Seattle Historic Landmark and on June 20, 2002 that nomination was denied as not meeting the criteria for designation. For this reason, the demolition and modification of structures is concluded not to be an impact to historic resources.

Other Impacts

Several adopted codes, ordinances, and agencies will appropriately mitigate the other use-related adverse impacts created by the proposal. Specifically, these are the Puget Sound Clean Air Agency (increased airborne emissions); the Seattle Land Use Code (increased light and glare from new lighting of the parking), and the Seattle Energy Code (long-term energy consumption).

The other impacts not noted here as mitigated by codes, ordinances, or conditions (increased ambient noise, increased pedestrian traffic, increased demand on public services (in addition to police services and utilities) are not sufficiently adverse to warrant further mitigation by conditions.

No SEPA conditioning of long-term impacts of the proposed action appear necessary.

CONDITIONS - SEPA

Prior To Construction Or Grading Permit Issuance

1. The owners and/or responsible parties shall submit to DCLU for review and approval a finalized Truck Trip Plan which delineates the circulation routes that trucks carrying project-related materials will take and the hours they may travel so as to minimize negative traffic impacts on nearby properties, streets and intersections.
2. File a Notice of Intent to Demolish with PSCAA.

During Construction

The following condition(s) to be enforced during construction shall be posted at the site in a location on the property line that is visible and accessible to the public and to construction personnel from the street right-of-way. If more than one street abuts the site, conditions shall be posted at each street. The conditions will be affixed to placards prepared by DCLU. The placards will be issued along with the building permit set of plans. The placards shall be laminated with clear plastic or other weatherproofing material and shall remain in place for the duration of construction.

3. The hours of exterior demolition and construction shall be limited to weekdays between the hours of 7:00 a.m. and 6:00 p.m. on non-holiday weekdays and Saturdays from 9:00 a.m. to 5:00 p.m. Once each floor has been fully enclosed, interior construction may occur at any time in compliance with the Noise Ordinance. The Department reserves the right to allow waivers of this restriction on a case by case basis, where such work can be shown to be of an emergency nature, necessitated by safety or street use (traffic) concerns, or which would substantially shorten the overall construction time frame. Prior approval must be obtained from DCLU for such work.
4. Follow the terms and conditions of the DCLU approved Truck Route Plan.
5. An on-site parking area or areas shall be created and maintained on-site with capacity to accommodate construction worker's vehicles and other construction-related vehicles to the maximum extent construction activities (grading, paving, landscaping, etc.) on-site will allow. These parking areas shall be maintained in a manner which prevents the tracking of mud or dust onto surrounding streets.

CONDITIONS – SCHOOL DEPARTURE

For the Life of the Project

6. Afternoon bus loading shall take place on the east side of 51st Av. S. from 30' south of the S. Graham St. and 51st Av. S. intersection to the southern end of the School District property along 51st Av. S. The loading zone hours will be from 2 PM to 4 PM Monday to Friday.
7. Morning bus unloading, as well as load and unload operations for half day programs or as needed, shall take place on the south side of S. Graham St. from the existing eastern driveway to the new proposed western driveway in front of the school.
8. The south side of S. Graham St. is to be signed for a load and unload only zone from the existing eastern drive to the proposed new western drive between the hours of 8am – 5pm Monday to Friday at the front of Graham Hill Elementary School.
9. Seattle Public Schools will work with Seattle Department of Transportation to review parking restrictions on the north side of S. Graham St. along the frontage of Graham Hill Elementary School to relieve traffic congestion and increase safety.
10. A handicap access ramp will be provided on the west side of Seattle Public School property to allow ADA access to the 51st Av. S. bus loading area.
11. Graham Hill Elementary will provide yearly to all new families a parent/student school safety manual.
12. Additional landscaping shall be provided on the Graham Hill Elementary school frontage along 51st Av. S. with input and review of adjacent neighbors prior to submittal to DCLU.
13. Seattle Public Schools will work with Seattle Department of Transportation to review parking requirements/restrictions at the intersection of S. Graham St. and 51st Av. S. in order to facilitate turning movements of school buses onto Graham St.
14. All right of way changes and or improvements suggested by Seattle Public Schools will be subject to Seattle Department of Transportation review and approval.

Signature: (signature on file) Date: April 17, 2003
Scott Kemp, Senior Land Use Planner
Department of Design, Construction and Land Use